

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:13CR00077 HEA(DDN)
)	
JACOB OLSON,)	
)	
Defendant.)	

GOVERNMENT'S MOTION TO MODIFY
CONDITIONS OF PRETRIAL RELEASE

Comes now the United States of America, by Richard Callahan, United States Attorney for the Eastern District of Missouri, and Tracy Lynn Berry, Assistant United States Attorney for said District, and herein requests that this Honorable Court modify defendant's conditions of pretrial release.

On March 1, 2013, the Honorable United States Magistrate Judge Terry I. Adelman released defendant on a \$20,000.00 unsecured bond. However, until recently, the government was unaware that defendant was employed at Convergys working in a call center. Upon information and belief, such employment offers defendant access to the identifying information of others. If the government had been aware of the employment at the time the bond was granted, it would have requested third party notification as a special condition of release. Despite the lapse of time and as defendant has been charged with using the identifying information of another and possessing false identification documents, the government requests that the conditions of release be modified to include a the requirement that the United States Pretrial Services Office notify defendant's employer of the nature of the charges.

On July 22nd, the government sent electronic correspondence notifying counsel for defendant of it's desire to seek amendment of the release conditions. As of the filing of this pleading, counsel has not received a response.

Accordingly, the government requests that the conditions of release be modified to include third party notification.

Respectfully submitted,

RICHARD CALLAHAN
United States Attorney

s/ Tracy Lynn Berry
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CERTIFICATE OF SERVICE

Copy of the foregoing was served electronically through the electronic case filing system this 23rd day of July, 2013, to:

Mark R. Bahn, Esq.

s/ Tracy Lynn Berry
ASSISTANT UNITED STATES ATTORNEY